



STATE OF WASHINGTON
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August 3, 2001

Chief Tom Sugrue, Chief
Federal Communications Commission
Wireless Telecommunications Bureau
1919 – M Street NW
Washington, D.C. 20554

Dear Mr Sugrue,

In response to your request of NENA and APCO representatives at a meeting on July 26, 2001, I am pleased to advise you of the status of implementation of wireless E911 in the State of Washington.

Phase I installation is proceeding slowly with three carriers having made a commitment to implement in the near future and some actual implementation activities underway in the urban counties. We have seen more positive progress in the last six weeks than in the previous six years since Washington statutorily required delivery of the caller's phone number from wireless carriers

In recognition of the Phase II mandate the public safety answering points (PSAP) in Washington State have been working diligently for several years to be ready to utilize the Phase II caller location information from wireless carriers by October 1, 2001. I can report that all Washington State PSAPs will be ready to receive Phase II location data by October 1, 2001 for carriers deploying NCAS or hybrid solutions. Additionally, the primary data providers, Qwest through Intrado and Verizon, have informed us that they will be prepared to transmit the Phase II data to the PSAPs, typically within the existing data format. The necessary PSAP equipment upgrades were initiated as part of the preparation for Y2K. PSAPs not upgraded for Phase II at that time will be finished shortly with the installation of new 911 phone systems.

Some PSAPs are placing Phase II orders at this time. Others are waiting as training, call handling procedures and other issues are finalized by the PSAPs. My office has been investigating the reasons PSAPs were hesitating with the placement of Phase II orders. In

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Washington State, county government operates most of the PSAPs. The elected officials are hesitant to move partly because of an uncertainty over the relationship with

the wireless carriers. That uncertainty stems from both not being familiar with working with non-regulated carriers and from not being comfortable that the cost recovery issues are finally settled. E911 is traditionally accomplished by acquiring tariffed services from the local exchange carrier under an acquisition process where rates and relationships are defined by the state utility commission. The counties must enter into contracts, which will be the defining mechanism for working with wireless carriers. In addition to the trepidation the counties are experiencing in forming a new type of relationship with wireless carriers they are universally faced with staffing and operational issues that preclude taking time to work on the details of implementing the internal procedures to utilize the information from wireless Phase II calls. None of the 72 PSAPs in the state is at full-authorized staff, with some as low as 50%. Their funding is threatened by revenue reductions due to tax cut initiatives, while the calls they must handle are increasing both in number and complexity. Adding the task of working with the wireless companies to activate Phase II service simply is not the highest priority at the moment.

In recognition of the problems we have identified, the State E911 Program Office is working with counties and carriers to increase the number of Phase II orders being placed in Washington. Those efforts include the development of a state contract with the wireless carriers to facilitate county requests for service and coordination efforts to make it easier for PSAPs to accomplish the necessary work before they can accept wireless calls with Phase II features. These activities are being undertaken in recognition of the considerable work that has been accomplished by the PSAPs to be technically ready for Phase II and under the sincere hope that the current cooperation some wireless carriers are demonstrating toward implementation of Phase I will transcend to implementation of Phase II.

I thank the Commission for its interest in the progress of integrating wireless to enhanced 911 systems. Given that personal phones have become a standard for communications in the United States we cannot move fast enough to provide an appropriate level of access to emergency services from wireless phones. The citizens have grown to anticipate, and in Washington's case demanded through the passage of a referendum, 911 dialing that automatically sends information that will permit dispatch of assistance. I encourage the Commission to continue to think of that expectation when considering any action that impacts 911 service.

Sincerely,

Robert G. Oenning,
Washington State E911 Administrator

RGO: tcl

Cc: Jim Schlichting, Deputy Chief
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